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**NORTH CAROLINA DEPARTMENT OF
ENVIRONMENT AND NATURAL RESOURCES**

DIVISION OF WASTE MANAGEMENT

April 22, 1999



**JAMES B. HUNT JR.
GOVERNOR**

**WAYNE MCDEVITT
SECRETARY**

**WILLIAM L. MEYER
DIRECTOR**

Commander, Atlantic Division
Naval Facilities Engineering Command
1510 Gilbert Street (Building N-26)
Norfolk, Virginia 23511-2699

Attention: Ms. Maritza Montegross
Navy Technical Representative
Code 18233

Commanding General
Marine Corps Base
PSC Box 20004
Camp Lejeune, NC 28542-0004
Attention: AC/S, EMD/IRD

RE: NC Superfund Section Comments
Draft No Further Response Action Plan
Decision Document-Site 68
Marine Corps Base, Camp Lejeune

Dear Ms. Montegross:

We reviewed of this document and submit the following comments:

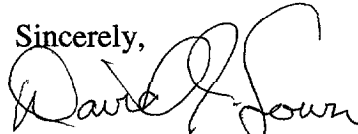
1. This site is a former open dump (in use for 30 years) and is suspected of having received 2,000 gallons of solvent. It needs institutional controls and periodic monitoring. While, at present, further remedial action may not be warranted, future users of the site should be protected through the implementation of institutional controls. Without additional investigation, any intrusive activities, such as soil excavation, should be restricted. Periodic groundwater monitoring to confirm that solvents have not mobilized is necessary.
2. Page 1-5, the third paragraph. The significance of the NFRAP designation is overstated. While it may be fair to state that the site is not known to be impacting human health and the environment, the site is a former open dump. The statement, "the site poses no significant risk to human health and the environment," is not justified. The NCP states, "Sites that EPA decides do not warrant moving further in the site evaluation process are given a 'No Further Response Action Planned' (NFRAP) designation in CERCLIS. This means that no additional federal steps under CERCLA will be taken at the site unless future information so warrants." This is not the same as determining that there is no

threat. Data collected has failed to find environmental exposure; however, the history of the site suggests that it may still have the potential to harm the environment.

3. Attached are our comments on risk assessment in the NFRAP and the Final Pre-Remedial Investigation Screening Study for Site 68. Evaluation of the risk posed by pesticides in the sediments is probably the most pressing issue.

We appreciate the opportunity to review this document. Please call me at (919) 733-2801, extension 278 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "David J. Lown", written over the typed name.

David J. Lown, LG, PE
Geological Engineer
Superfund Section

Attachments

cc: Gena Townsend, US EPA Region IV
Neal Paul, MCB Camp Lejeune

NORTH CAROLINA DEPARTMENT OF
ENVIRONMENT AND NATURAL RESOURCES
DIVISION OF WASTE MANAGEMENT

March 23, 1999



JAMES B. HUNT JR.
GOVERNOR

WAYNE McDEVITT
SECRETARY

WILLIAM L. MEYER
DIRECTOR

TO: David Lown

FROM: David Lilley

DBL

RE: Comments prepared on the Draft No Further Response Action
Plan Decision Document, Site 68, MCB Camp Lejeune, NC.
January 25, 1999

After reviewing the above mentioned document, I offer the following
comment:

1. Page 1-6, Section 1.2.1.2, second paragraph: The screening levels contained within the NC Risk Analysis Framework (RAF) document are **DRAFT** numbers and **NOT** to be used or cited in Risk Assessments or cleanup level determinations. The use of the **METHODOLOGIES** contained within the RAF is acceptable. It is recommended the RGOs be calculated using the methodologies outlined in the Supplemental Guidance to RAGS: Region 4 Bulletins, Bulletin No. 5, 1995.
2. Page 3-2, second paragraph: According to Tables 5-41 through 5-43, the HIs for residential adults and children are 6 and 14, respectively, not the numbers shown in this paragraph. Please make the necessary changes.
3. Page 3-2, first paragraph: Screening criteria were exceeded for sediment, but no ecological assessment was conducted to determine what risks these contaminants pose to the environment. Therefore, it is not possible to conclude (page 4-1) that no evidence exists to suggest that the soil, groundwater, surface water, or sediment are sufficiently contaminated to pose a threat to the human health or environment. Please provide evidence to show that, although sediment screening criteria were exceeded, there are no risks to the environment. This can be accomplished by analyzing the exposure pathways as outlined in Step 1 of the *Ecological Risk Assessment Guidance for Superfund: Process for Designing and Conducting Ecological Risk Assessments*, June, 1997. In step 1, it is recommended that only Region IV sediment screening levels be used. If no complete exposure pathways exist, the COPCs can be dropped from consideration. If COPCs pass through Step 1, Step 3 (Problem Formulation) should be

completed to discuss each COPC and refine the document. In Step 3, other screening values can be used.

4. Page 3-2, second paragraph: The levels of iron and manganese exceeded the NC Drinking Water Standards. How will this be handled?

NORTH CAROLINA DEPARTMENT OF
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March 23, 1999

JAMES B. HUNT JR.
GOVERNOR

WAYNE McDEVITT
SECRETARY

WILLIAM L. MEYER
DIRECTOR

TO: David Lown

FROM: David Lilley *DBL*

RE: Comments prepared on the Baseline Risk Assessment
Contained within the Final Pre-Remedial Investigation
Screening Study, Sites 12, 68, 75, 76, 84, 85, and 87, MCB
Camp Lejeune, NC.
November, 1998

NOTE: The only portion of this document reviewed was
the Site 68 BRA.

After reviewing the above mentioned document, I offer the following
comments:

1. Page 5-11, fourth paragraph: It is claimed that Aroclor-1260 exceeded the residential screening value. According to Appendix I and Table 5-2, Aroclor-1260 did not exceed the residential screening value. Please correct this inconsistency.
2. Page 5-11, fifth paragraph: According to Table 5-3, the inorganics that exceeded residential soil COC screening values were antimony, arsenic, iron, and manganese. Please correct this inconsistency.
3. Page 5-12, fourth paragraph: Change beryllium to manganese to be consistent with Table 5-5.
4. Table 5-6: According to Appendix I, the concentration range for aluminum is 186J to 3,690 ug/l, not 373 to 1,600 ug/l. Please double check this information. Since aluminum exceeded the MCL 3/3 times, it should be retained as a COPC. Please make the necessary corrections.
5. Table 5-6: According to Appendix I, the high concentration of barium was 54.5J ug/l, not 50.9 ug/l. Please make the necessary corrections.

6. Table 5-6: According to this table, concentrations of iron exceeded two different screening levels twice, but was not retained as a COPC. Please explain.
7. Page 5-13, second paragraph: Add thallium to the list of COPCs to be consistent with Table 5-6.
8. Pages 5-42 and 5-43: The HI from the ingestion of groundwater for the residential child and adult were 14 and 6, respectively; not 4 for children and 1.8 for adults. Please make the appropriate corrections.